

(INND Rev. 8/16)

SCANNED at ISP and Emailed on page 1  
 5-30-19 by RH - 73 pages  
 (date) (Initials) (num)

## UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF INDIANA

[This form is for prisoners to sue for civil rights violations. NEATLY print in ink (or type) your answers.]

Randy Lee Jent

[You are the **PLAINTIFF**, print your full name on this line.]

v.

Pauline Williams, Lt. IDOC

[The **DEFENDANT** is who you are suing. Put ONE name on this line. List ALL defendants below, including this one.]

Case Number 3:19-cv-00046-JD-MGG

[For a new case in this court, leave blank.  
The court will assign a case number.]

[The top of this page is the caption. Everything you file in this case must have the same caption. Once you know your case number, it is VERY IMPORTANT that you include it on everything you send to the court for this case. DO NOT send more than one copy of anything to the court.]

### PRISONER COMPLAINT

#	Defendant's Name and Job Title	Work Address
1	[Put the defendant named in the caption in this box.] Anthony J. Watson, C/O Indiana Department of Corrections	Indiana State Prison One Park Row Michigan City, IN 46360
2	[Put the names of any other defendants in these boxes.] Kaitlyn Radats, Stg. Indiana Department of Corrections	Indiana State Prison One Park Row Michigan City, IN 46360
3	K. ST. Martin, Lt. Indiana Department of Corrections	Indiana State Prison One Park Row Michigan City, IN 46360

[If you are suing more defendants, attach an additional page. Number each defendant. Put the name, job title, and work address of each defendant in a separate box as shown here.]

- How many defendants are you suing? 4
- What is the name and address of your prison or jail? Indiana State Prison One Park Row Michigan City, IN 46360
- Did the event you are suing about happen there? ☒ Yes. ☐ No, it happened at: \_\_\_\_\_
- On what date did this event occur? 08/17/2018

[DO NOT write in the margins or on the back of any pages. Attach additional pages if necessary.]

### CLAIMS and FACTS

DO: Write a short and plain statement telling what each defendant did wrong.

DO: Use simple English words and sentences.

**DO NOT:** Quote from cases or statutes, use legal terms, or make legal arguments.

DO: Explain when, where, why, and how each defendant violated your rights.

DO: Include every fact necessary to explain your case and describe your injuries or damages.

DO: Number any documents you attach and refer to them by number in your complaint.

**DO NOT:** Include social security numbers, dates of birth, or the names of minors.

DO: Use each defendant's name every time you refer to that defendant.

DO: Number your paragraphs. [*The first paragraph has been numbered for you.*]

1. During the months of June, July, and August of 2018 i had filed grievances against Lt. Pauline Williams and officer Anthony J. Watson claiming discrimination over the loaner tv program.  
I had also had several verbal arguments in the ISO building over the issue. The two did not like that the facts were in my favor. On August 17, 2018 just two days after the third grievance was filed (see exhibits A-1 through B-5) i was unnecessarily escorted to a holding cell by officer Watson within minutes after i was awoken by officer Blakely. The cell was not equipt with a sink, toilet, nor any type of drain. I was left and ignored from 7:09 am until roughly 8:25 am as i begged from about 20 minutes after i arrived to the cell until i no longer could hold my urine. During that time the release coordinator relayed my emergency need to use the restroom to Sgt. Radats and/or Lt. Williams. I was ignored as i yelled continueosly. The Sgt's office is only about 30 to 40 feet down the hall from where i was being held.(see also exhibits B-2 and B-3 that reflects my bladder/urinating probems were an ongoing issue and staff was aware of it).  
Counselor Sherry Hatchel was in her office near the Sgt's office and was notified of my situation yet, out of spite because of my grievances involving her she chose to allow the issue to compound. Just three days prior counselor Hatchel filed a fabricated misconduct report that lead to the circumstances after i was being detained for the hearing on the misconduct that morning. i had to urinate in the cell floor in order to prevent urinating on myself. Officer Watson was told i urinated in the cell and returned, cuffed me and proceeded to mop the urine while stating "you know what they do to dogs who piss and shit where they lay, they rub their faces in it". He then locked me back in the cell until i was escorted behind the wall to ISP.

### Claims and Facts (continued)

This was near 10:30am. He wrote out a misconduct report leaving out the fact he neglected to respond and escort me to a restroom compounding the situation. Lt. Williams was once again notified and came to the cell with sgt. Radats, officer Watson, and another officer to hear my side of the problem shortly before i was escorted to ISP. Sgt. Radats fabricated another misconduct report in order to support officer Watson's by further downplaying my credibility in case i contested the report at DHB. Lt. ST. Martin collaborated with Lt. Williams possibly through inter-departmental e-mails or other communications to convict me through information management. The Lts' withheld the facts that staff neglected my emergency. A common practice within the department of corrections that resulted in me suffering in segregation for eight months with the psychological impact of the circumstances and further deprived of communication with my family. This was a scary situation especially with my mother and father both fighting cancer. The events also resulted in me being deprived of important programs like substance abuse which i was originally ordered to take at RDC and preventing me from any possible early release and precious time with my parents before their time on this Earth expires. These events were a result of reprisal for grievances filed and grievance specialist Jeremy Wallen's refusal to acknowledge and investigate or forward the matters to the appropriate official. DOC policy 00-02-301 (VIII) Use of offender grievance process without fear of reprisal, prohibits staff from retaliating. (SEE exhibit R!) The circumstances and events that occurred on 8/17/2018 were shaped or created by LT. Williams and her cronies. A complete list of exhibits have been attached to this complaint.

5. When did this event happen?

- ☐ Before I was confined.
- ☐ While I was confined awaiting trial.
- ☒ After I was convicted while confined serving the sentence.
- ☐ Other: \_\_\_\_\_

6. Have you ever sued anyone for this exact same event?

- ☒ No.
- ☐ Yes, attached is a copy of the final judgment OR an additional sheet listing the court, case number, file date, judgment date, and result of the previous case(s).

7. Could you have used a prison grievance system to complain about this event?

- ☐ No, this event did not happen in a prison or jail.
- ☐ No, this event is not grievable at the prison or jail where it occurred.
- ☒ Yes, I filed a grievance and attached is a copy of the response from the final step.
- ☒ Yes, this event was grievable, but I did not file a grievance because grievance

specialist Jeremy Wallen prevented me from moving forward in the grievance process by withholding the level two appeal forms(see exhibits J-1through J-13, K-1 through K-5, L-1 and L-2, M-1 through M-4,)

8. If you win this case, what do you want the court to order the defendant(s) to do?

[NOTE: A case filed on this form will not overturn your conviction or change your release date.]

I want my conduct file clear of the 4 frivolous misconducts that were filed between 08/14/2018 and 08/17/2018, my original status to be reinstated with my work release eligibility valid and all staff involved to be held accountable accordingly. I also feel i should be awarded an amount of compensation as part of the staffs participation in the neglect and wrongful convictions determinable by the court as a mechanism to detour staff from this type of behavior.

[Initial Each Statement]

RJ I will pre-pay the filing fee OR file a prisoner motion to proceed in forma pauperis.

RJ I will keep a copy of this complaint for my records.

RJ I will promptly notify the court of any change of address.

RJ I declare under penalty of perjury that the statements in this complaint are true.

I placed this complaint in the prison mail system on 05/30/2019 at 12:30 am (pm)

[Do not fill in this date and time until you give the complaint to prison officials to send to the court.]

Randy Joe  
Signature

170896  
Prisoner Number